

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

**DECLARATION OF MELISSA BATTINO ON BEHALF OF THE WARNER MUSIC
PLAINTIFFS IN OPPOSITION TO DEFENDANTS' SECOND MOTION TO COMPEL**

I, Melissa Battino, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney, currently employed as Vice President, Business and Legal Affairs, at Rhino Entertainment Company, a Warner Music Group company. I have held that position since July 2016. I have personal knowledge of the facts set forth below and/or have learned of these facts as a result of my position and responsibilities at Warner Music Group. If called upon and sworn as a witness, I could and would testify competently as to the matters set forth herein.

2. I submit this declaration on behalf of Plaintiffs Atlantic Recording Corporation, Bad Boy Records LLC, Elektra Entertainment Group Inc., Fueled By Ramen LLC, Roadrunner Records, Inc., and Warner Records Inc. (f/k/a Warner Bros. Records Inc.) (hereinafter, collectively, "Warner Music"), all of which are individual record companies under the Warner Music Group umbrella.

3. I understand this declaration is to be submitted to the Court in connection with Plaintiffs' opposition to a motion to compel filed by Defendants Cox Communications, Inc. and

CoxCom, LLC (collectively, “Defendants” or “Cox”). I also understand that Cox seeks documents and information relating to notices Warner Music has received pursuant to Sections 203 or 304 of the Copyright Act (17 U.S.C. §§ 203, 304) that purport to terminate Warner Music’s United States copyright rights in certain sound recordings.

4. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Melissa Battino

Executed this 8th day of July 2019 in Los Angeles, California.